



July 3, 2017

Federal Communications Commission  
Commission's Secretary  
445 12<sup>th</sup> St. SW  
Room TW-A325  
Washington, DC 20554

**Re:** *In the Matter of Advanced Methods to Target and Eliminate Unlawful Robocalls, CG Docket No. 17-59*

To Whom It May Concern:

Quicken Loans is pleased to submit its comments on the *Notice of Proposed Rulemaking and Notice of Inquiry* on Advanced Methods to Target and Eliminate Unlawful Robocalls.<sup>1</sup>

### **Background**

Detroit-based Quicken Loans is the nation's second largest retail home mortgage lender. The company has closed nearly \$300 billion of mortgage volume across all 50 states between 2013 and the end of 2016. Quicken Loans generates loan production from web centers located in Detroit, Cleveland, and Scottsdale, Arizona. The company also operates a centralized loan processing facility in Detroit, as well as its San Diego-based One Reverse Mortgage unit. Quicken Loans ranked "Highest in Customer Satisfaction for Primary Mortgage Origination" in the United States by J.D. Power for the past seven consecutive years, 2010 – 2016, and highest in customer satisfaction among all mortgage servicers the past three years, 2014 – 2016.

Quicken Loans was ranked No. 5 on FORTUNE magazine's annual "100 Best Companies to Work For" list in 2016, and has been among the top-30 companies for the last 13 years. It has been recognized as one of Computerworld magazine's '100 Best Places to Work in IT' the past 12 years, ranking No. 1 in 2016, 2015, 2014, 2013, 2007, 2006 and 2005. The company moved its headquarters to downtown Detroit in 2010, and now more than 10,000 of its 16,000 team members work in the city's urban core.

### **Comments**

We appreciate the work of the industry-led "Robocall Strike Force", which includes a broad range of stakeholders and aims to reduce the number of illegal calls across networks. In October 2016, the Strike Force released a report<sup>2</sup> describing a path to combat illegal calls and included a request for the FCC to provide guidance on when it's permissible for a provider to block a call. With

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<sup>1</sup> *Advanced Methods to Target and Eliminate Unlawful Robocalls*, FCC 17-24, CG Docket No. 17-59, FCC (2017)

<sup>2</sup> Robocall Strike Force Report, Robocall Strike Force (2016), <https://transition.fcc.gov/cgb/robocall-strike-force-final-report.pdf> (Strike Force Report)

over four million robocall complaints made to the FCC and the Federal Trade Commission in 2016<sup>3</sup>, we are glad to see the FCC take action and through this NPRM/NOI to seek out ways to block illegal robocalls.

In the NPRM/NOI, the Strike Force<sup>4</sup> and FCC<sup>5</sup> tentatively define the term “illegal robocall” as the following:

*“One that violates the requirements of the Telephone Consumer Protection Act of 1991 (“TCPA”), the related FCC regulations implementing the Act, or the Telemarketing Sales Rule, as well as any call made for the purpose of defrauding a consumer, as prohibited under a variety of federal and state laws and regulations, including the federal Truth in Caller ID Act.”*

Respectfully, this definition is somewhat circular. It doesn't tell us what a robocall is. The rule should define “Robocall,” so that the industry and consumer groups can understand what's included and what isn't. “Robocall” is a contraction of robotic call, and encapsulates the original issue for which the statute was passed calls shared their messages whether you wanted to hear them or not, calls that disrupted phone lines because the recipient couldn't end them, calls from “robots,” as it were. In other words, a “robocall” is:

*“Any telephone call to a telephone number using an artificial voice or prerecorded message where a live person is not on the line and available to communicate with the intended recipient of the call at the time of connection to the telephone number called.”*

Adding a clear, descriptive definition will prevent inconsistent readings and allow all involved to understand their rights and obligations.

## **Conclusion**

We thank the Commission for the opportunity to comment on the proposed rulemaking. We look forward to a continued dialogue with the FCC as it examines how to stop bad actors and calls that harm the consumer and hurt business communications.

Should you have any further questions, please contact me at garyweingarden@quickenloans.com or 313-373-4554.



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<sup>3</sup> Consumer Advisory Committee Unwanted Calls Recommendation, FCC (2017), [https://apps.fcc.gov/edocs\\_public/attachmatch/DOC-344985A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/DOC-344985A1.pdf)

<sup>4</sup> See Strike Force Report at 39, n. 1.

<sup>5</sup> See Advanced Methods to Target and Eliminate Unlawful Robocalls at 6, n. 13.